

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
District of New JerseyCivil DivisionDavid Greco,
Plaintiff

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Det Lauren Laielli, Sergeant Frank Pace, New Jersey
Office of Homeland Security and Preparedness

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

RECEIVED

JUN 16 2022

AT 8:30 _____ M
WILLIAM T. WALSH
CLERK

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	David Greco
Street Address	246 Orchard Ave
City and County	Somerdale, Camden County
State and Zip Code	New Jersey, 08083
Telephone Number	856-275-9559
E-mail Address	davegreco33@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Lauren Laielli</u>
Job or Title <i>(if known)</i>	<u>Detective in the NJ Office of Homeland Security & Preparedness</u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 2

Name	<u>New Jersey Office of Homeland Security and Preparedness</u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u>1200 Carlos M Negron Dr</u>
City and County	<u>Trenton,</u>
State and Zip Code	<u>New Jersey, 08691</u>
Telephone Number	<u>609-584-4000</u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 3

Name	<u>Frank Pace</u>
Job or Title <i>(if known)</i>	<u>Sergeant in the Gloucester Twsp Police Dept</u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u>New Jersey,</u>
Telephone Number	<u>Gloucester Twsp Police # 856-228-4500</u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 4

Name	<u></u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

28 U.S. Code § 4101

8 U.S. Code § 1324c

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* David Greco, is a citizen of the
State of *(name)* New Jersey.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Lauren Laielli, is a citizen of
the State of *(name)* New Jersey. Or is a citizen of
(foreign nation) _____.

Page 3A

Additional Defendants:

a.

The defendant, Frank Pace, is a citizen of the State of New Jersey

The defendant, the New Jersey Office of Homeland Security and Preparedness, is part of the Governor's office of New Jersey and a government organization.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The defendants gave falsified documents to a Judge, and then told him multiple defamatory falsehoods, in absentia, as well as telling a defamatory falsehood to the Press, which led to a large scale police action against the Plaintiff, for no crimes, a police raid of his home, without probable cause, and has caused substantial damage to the Plaintiff's health, reputation and life, both at the time, now and continuing into the future.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1) Defendants went before Judge McBride, as "the State", because Detectice Lauren Laielli is from the New Jersey OHSP and was permitted to testify as "the State" on 9/6/19, with falsified documents and told multiple defamatory falsehoods. The defendants took advantage of testifying "in absentia" and after they handed the Judge a falsified document, exhibit S-7, Detective Laielli backed it up with a defamatory falsehood, tricking the Judge into believing the Plaintiff communicated with the Synagogue shooter (Pittsburgh), then told several defamatory falsehoods, including telling the Judge they got evidence from the FBI that "Mr Greco was in communication with the Synagogue shooter before the mass shooting". Plaintiff has just contacted the FBI. Continued on page 4A -

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The resulting police action from the defendants testifying with falsified evidence, got Plaintiff pulled over, removed from my car, guns pointed at me, handcuffed and taken to my home for a search. Plaintiff's health was damaged by police action, police raid into his home and has a massive lawyer debt after being dragged into the court system. Plaintiff lives with the feeling police will raid his home at any moment, even though he's not wanted for a crime, because they already did it. Plaintiff's feeling of safety in his own home has been destroyed. Damages to Plaintiff's health, reputation, life and future, and, also including legal fees to Albert Rescinio(50,000) - Damages - \$350,000.

Pages 4A, 4B and 4C

Sergeant Pace testified before Judge McBride, telling him that when he and the other defendant went to the Plaintiff's home in August 2019, for the zero crimes he was wanted for, that the Plaintiff refused to obey his orders and open the door. He also claimed the Plaintiff refused to obey his orders and come down stairs for police. He was lying, both times. He stated it was only after the Plaintiff's father (who let the police in, because the Plaintiff was sound asleep) went and got him, the Plaintiff came down. The Judge asked Sergeant Pace (pages 50-53 of the transcript, which will be with this complaint), "since Mr. Greco refused to obey your orders, since he refused to open the door for police, and refused to come down stairs for police, do you feel any search warrant for his house to seize his rifle should be a "no-knock" search warrant; and Sergeant Pace replied "absolutely". The problem the Plaintiff has with that, is that Sergeant Pace was lying. The Plaintiff was sound asleep in his own home, not anticipating a visit from law enforcement, for the zero crimes he was wanted for. Plaintiff's father woke him up and he went down to meet with them. The body cam video will show plain as day that the Plaintiff had just been sound asleep, as a person's face shows this. The defendants had to see this on his face as well, but Sergeant Pace lied to the Judge, twice, and this helped trick the Judge and lead to a "no-knock, good cause" search warrant being issued, to invade my home and seize my property. Plaintiff's attorney in the State case, Albert Rescinio, has the body cam video.

When returning from work on 9/6/19, Plaintiff drove his normal route, right into a large scale police trap that was waiting for him. Plaintiff was pulled over for no reason in the middle of this large scale police trap, and ordered to get out of his car. Plaintiff's hands were handcuffed and he was placed into a police car, for the zero crimes he was wanted for, and driven to his home, where he got to watch police raid and search his home, to seize his property. The defendants created a civil case against the Plaintiff with falsified documents and multiple defamatory falsehoods, resulting in him being treated as a criminal and having his home raided, without probable cause. Plaintiff has proof of this. One example which you'll see in the court transcript from 9/6/19, which the Plaintiff will include with this complaint, is the defendants put into evidence what they called exhibit S-7, a post they claimed was from the Plaintiff. The defendants told Judge Edward McBride that S-7 was the Plaintiff's "gab.com post" reposting Robert Bowers' (Pittsburgh Synagogue shooter) post and that the Plaintiff quoted what Robert Bowers said right before he carried out the Synagogue shooting. To be clear, the post is not the Plaintiff's, as the defendants stated to a Judge, and the Plaintiff did not quote Robert Bowers, ever, as the defendants stated to a Judge. The defendants totally falsified the document. The only things real on exhibit S-7 are the Plaintiff's picture and screen name. Everything else on exhibit S-7 is falsified information by the defendants, to trick the Judge into believing the Plaintiff had reposted the Synagogue shooter's post and quoted what he said before entering the Synagogue. Plaintiff will include the S-7 post, and has, on 8/3/21, requested his attorney in the State case, Albert Rescinio, subpoena Gab.com to search for what the defendants gave to a Judge as "1 of Mr Greco's Gab posts". The result of the subpoena will prove it's not one of my Gab posts, it's a fake. It's also the sole piece of evidence the defendants gave the Judge showing the Plaintiff communicated with the Synagogue shooter....and the defendants made it themselves. The Plaintiff never, ever, communicated with the Synagogue shooter, yet at this moment more than 1 Judge and the entire world, thanks to the internet, believe that the Plaintiff communicated

Page 4B ---- with the Synagogue shooter and that he communicated with the Synagogue shooter before the mass shooting, solely because of the defendant's defamatory falsehoods and the falsified documents they gave Judge Edward J McBride. The only reason the defendants were able to appear "in absentia", representing "the State", given the opportunity to hand a Judge a falsified Gab.com post, more than 1 altered Gab post and tell multiple defamatory falsehoods to a Judge, was because defendant Detective Laielle, works for New Jersey's Office of Homeland Security and Preparedness, which is part of the Governor's office. This being true, the defendants were able to appear without the Plaintiff there to defend the truth and his Constitutional rights. The falsified documents and defamatory falsehoods the defendants told Judge McBride have caused damage to the Plaintiffs health, safety, reputation, future, deprived him of his property and caused him a massive debt to an attorney to represent him in the "States" case and Federal lawsuit, for the zero things the Plaintiff did.

2) Plaintiff got an attorney and filed a federal Civil Rights law suit. The defendants answered the Plaintiff's law suit with falsified paperwork that contains multiple defamatory falsehoods. They sent falsified evidence in response to my law suit to sabotage it and Plaintiff has proof of this, in the form of police body cam video (which Plaintiff's attorney in the State case, Albert Rescinio, has in his possession and can be provided for this case) from the visit the defendants paid the Plaintiff in August 2019, for the zero crimes the Plaintiff was wanted for, and an official court transcript the Plaintiff had made from the 9/6/19 hearing "in absentia" before Judge McBride, showing the defendants falsified the evidence from the August meeting with the Plaintiff, telling defamatory falsehoods to the Judge, as well as lying about the Plaintiff's on-line posts, as well as providing a falsified post to the Judge and more than 1 that they altered. Defamatory falsehoods like "based on evidence from the FBI, the Plaintiff was in communication with the Synagogue shooter, before the mass shooting" and the defendants had to cut short the August interview with the plaintiff, and lies making it sound like the plaintiff and the synagogue shooter were friends. Plaintiff will include the first 33 pages of the official court transcript from 9/6/19 (as well as pages 50-53), with the defendants defamatory falsehoods highlighted in yellow, as well as the completely falsified fake gab post, exhibit S-7. These defamatory falsehoods and falsified documents, after tricking Judge McBride, were submitted by the defendants to Judge Martinotti in my federal law suit. The falsified documents, containing a fake gab post, altered gab posts and defamatory falsehoods, by the defendants, successfully tricked him into believing the Plaintiff was a threat and Plaintiff has proof of this, in the form of the Judge's 2 opinions he put out, where he included, in both opinions he put out, the most powerful of the defendants defamatory falsehoods "based on evidence obtained from the FBI, Mr Greco was in communication with the Synagogue shooter before the mass shooting". Plaintiff has contacted the FBI on 8/4, asking for their help. Plaintiff will include the Judges opinions, with this complaint.

3) Plaintiff immediately filed an appeal after his federal law suit was dismissed without even being heard, after the Judge was tricked by the falsified documents and defamatory falsehoods by the defendants. The defendants answered the Plaintiffs appeal, once again, with falsified documents. The defendants sent paperwork that contains falsified documents, in the form of a completely fake Gab post and some altered gab posts and multiple defamatory falsehoods, to the appeals court, to damage the

Page 4C ---- Plaintiffs case. Currently the Judge doesn't know this, which is damaging the Plaintiff's reputation and case.

4) After lying multiple times to a Judge, giving him falsified documents, tricking him into launching a "no-knock" large scale police action against the Plaintiff, the defendants told the Press, Mr. Joseph Atmonavage, of the Star Ledger and NJ.com, defamatory falsehoods, including the - based on evidence obtained from the FBI, Mr Greco was in communication with the Synagogue shooter, before the mass shooting – fabricated lie. The defamatory falsehoods told to the Press not only seriously damaged the Plaintiff's reputation and life, it sabotages his future, guaranteeing he will never be able to get a job, as every prospective employer checks the internet and the defamatory falsehoods by the defendants are still available to the entire world, on-line, from more than 1 source. This has also caused the Plaintiff problems with some family members. Plaintiff will include Mr Atmonavage's article on NJ.com. The Plaintiff never refused to obey police orders, ever, and never communicated with the Synagogue shooter, ever, let alone before the mass shooting, yet Judges and the world, believe he was in communication with the Synagogue shooter and in communication with him before the mass shooting, solely because of a falsified Gab.com post and the defamatory falsehoods by the defendants. This has done and will continue doing, serious damage to the Plaintiff's health, life, reputation and future.

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Plaintiff's Civil Rights case was damaged by the defendants falsified documents and defamatory falsehoods. Plaintiff has proof in the form of the Judge's 2 opinions. This spanned 1 and 1/2 years of stress for the Plaintiff and tricked the Judge into dismissing the case. The Judge listed a defamatory falsehood by the defendants in his 2 opinions, proving it effected him; Damages \$100,000. Plaintiff has an appeal going, which is being damaged by the defendants multiple defamatory falsehoods; Damages \$75,000. The defendants told the Press a defamatory falsehood, which extremely damaged Plaintiffs reputation, life and ability to obtain employment; then, now and going forward; Damages - \$600,000. Plaintiff seeks damages in excess of \$1,000,000.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6/16/2022

Signature of Plaintiff

Printed Name of Plaintiff

David Greco
David Greco

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address